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United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARVIN CHARO COLLINS,

Defendant.

CASE NO: 1:24-CR-00255-JLT-SKO

STIPULATION TO SET TRIAL CONFIRMATION
HEARING AND TO CONTINUE DEADLINE FOR
PRETRIAL MOTIONS; ORDER

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorneys Arelis M. Clemente and Brittany M. Gunter, counsel for the government, and Daniel L. Harralson, counsel for Marvin Charo Collins (“the defendant”), that 1) a trial confirmation hearing be set for Monday, May 12, 2025, and 2) the deadline for filing motions in limine be continued to Monday, May 12, 2025. The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. On April 28, 2025, the Court set this case for trial on May 28, 2025. ECF 57. The Court also set a deadline of May 9, 2025, for motions in limine to be filed. ECF 57, 58.
2. On May 6, 2025, the government re-extended a plea offer to the defendant through his

counsel with a deadline to accept before May 9, 2025. Defense counsel indicated he needed time to discuss the plea offer with the defendant and anticipates discussing the plea offer with him on Thursday, May 8, 2025.

3. Defense counsel also informed the government of his concerns about whether he would be prepared for trial as currently set on May 28, 2025, given his limited ability to speak with the defendant based on where he is being housed. There is also voluminous discovery in this case. Defense counsel further indicated he is considering filing a motion for bail review, which would also impact his ability to effectively prepare for trial as currently set.
4. However, the defendant has not been amenable to excluding time under the Speedy Trial Act. The 70-day clock currently expires on June 14, 2025.
5. Based on the concerns related to defense counsel's ability to be prepared for trial as currently set and his plan to speak with the defendant on May 8 about the plea offer, the parties jointly request that the Court set the case for a trial confirmation hearing on May 12, 2025. Further, the parties jointly request that the motions in limine deadline be continued from May 9 to May 12, 2025.

IT IS SO STIPULATED.

Dated: May 7, 2025

MICHELE BECKWITH
Acting United States Attorney

By: /s/ ARELIS M. CLEMENTE
ARELIS M. CLEMENTE
BRITTANY M. GUNTER
Assistant United States Attorney

Dated: May 7, 2025

By: /s/ DANIEL L. HARRALSON
DANIEL L. HARRALSON
Counsel for Defendant

ORDER

IT IS ORDERED that:

- 1) a trial confirmation hearing is set for Monday, May 12, 2025, at 9:00 a.m., and
- 2) the deadline for filing motions in limine is hereby continued to Monday, May 12, 2025.

IT IS SO ORDERED.

Dated: **May 7, 2025**


UNITED STATES DISTRICT JUDGE